

Submission on the Proposed Acquisition of T and G Fresh by J and P Turner

To Commerce Commission

Reference JPT/T&G Fresh

Submitter Untamed Earth

Date 22 September 2026

Untamed Earth supports the proposed acquisition. Fresh Direct has helped us build a successful organic vegetable business, and we expect the combined distribution network to create substantial opportunities for further growth.

Position and experience

Untamed Earth supports the proposed acquisition and asks the Commission to grant clearance. We make this submission as an independent organic vegetable grower with direct experience of working with Fresh Direct. That relationship has been important to the development of our business. Fresh Direct has given us a practical route to market and has been willing to work with us as our operation has grown.

Untamed Earth is a certified organic farming business in Christchurch. We also sell through our farm shop, subscription boxes and local farmers' markets. Those direct channels remain important, while our relationship with Fresh Direct gives us access to a wider wholesale market and supports growth beyond the customers we can efficiently serve ourselves.

Our support is based on that commercial experience. We expect the combination of Fresh Direct and T&G Fresh to give us access to a wider customer base, broader distribution capability and more opportunities to increase production. For a growing organic business, distribution reach and dependable market access influence whether further investment is commercially viable.

How Fresh Direct has supported Untamed Earth

Untamed Earth has built a successful operation through its relationship with Fresh Direct. Growing is only one part of supplying the market. A producer must also reach customers consistently, manage seasonal volumes and maintain a reliable distribution programme. Fresh Direct provides the market connections and distribution capability that allow us to concentrate on production while still serving a wider group of customers.

This experience is relevant to the Commission's assessment of service quality and the options available to growers. The value of a wholesale relationship is not confined to the price received on a particular day. Reliability, market knowledge, customer coverage, communication and a willingness to develop supply with an independent grower all affect the grower's ability to invest and expand. Fresh Direct has performed well on those measures for Untamed Earth.

Opportunities created by the acquisition

The proposed acquisition should give Untamed Earth access to a larger distribution platform and additional customer relationships. We expect this to create opportunities to increase production, add products and reach markets that would be difficult for us to service efficiently on our own. Greater and more predictable volume should also improve the economics of investment in land, labour, equipment and compliance.

The opportunity is practical rather than speculative. Our business has already grown through cooperation with Fresh Direct. The proposed acquisition would extend the reach of a relationship that has worked well and give Fresh Direct more avenues through which to market produce supplied by businesses such as ours.

Independent growers and integrated growing

No concern about ownership of growing operations

Untamed Earth is not concerned that the combined business would own or operate growing businesses. We do not regard integrated growing as inconsistent with continued supply from independent growers. A wholesaler needs a broad range, sufficient volume and continuity across seasons. Its own production is unlikely to meet every customer requirement, and successful independent growers remain important sources of variety, specialist products and additional supply.

Our experience with Fresh Direct supports that view. It has helped an independent organic grower build a successful operation. We have seen no indication in our dealings that Fresh Direct lacks an incentive to develop independent suppliers. The proposed acquisition should increase the customer reach available to our business, which gives the combined operation a commercial reason to retain and grow productive relationships with suppliers such as Untamed Earth.

Grower succession and continuity of supply

The industry is facing a significant succession problem. Many older growers are selling their land and are not reinvesting in production. In some cases there is no family member or independent purchaser willing and able to take over the growing operation. Productive land may then move to housing or another use, and the associated infrastructure, skills and supply are lost. Re-establishing that capacity later is difficult, particularly for perishable crops that require reliable production and handling every season.

Against that background, investment in growing by T&G Fresh and MG Marketing has become an important means of maintaining production. Their entry into growing should not be treated simply as an attempt to displace independent growers. It can preserve production that might otherwise disappear when a grower retires or sells land. In our view, the Commission should examine the likely future of the relevant growing operations if this investment were not available.

Effects on supply and competition

Maintaining domestic growing capacity supports a reliable supply of fresh produce and helps keep prices competitive. If local production is lost, the market becomes more dependent on fewer growers or on imported produce exposed to freight costs, exchange rates and overseas supply conditions. Continued investment by larger industry participants can therefore strengthen supply and preserve productive assets, provided the combined business also maintains effective relationships with independent growers.

We recognise the Commission's concern that a vertically integrated wholesaler might favour its own produce. That possibility should be tested against actual conduct, crop conditions and commercial incentives. Untamed Earth's direct experience points the other way: Fresh Direct has invested time and effort in helping our independent business succeed, and we expect the proposed acquisition to expand rather than restrict our opportunities.

New Zealand ownership

Untamed Earth also supports bringing T&G Fresh under New Zealand ownership. We understand that the Commission's clearance decision is governed by the effect of the acquisition on competition and that local

ownership does not by itself answer that test. It can, however, affect how a business invests, responds to growers and makes decisions about the New Zealand supply chain.

In our view, the commercial motivations and economics of New Zealand ownership are more closely aligned with the long-term needs of local growers, customers and consumers. Owners whose operations and principal market are in New Zealand have a strong interest in maintaining domestic production, building durable grower relationships and responding to local supply conditions. Decisions and returns can be assessed against the needs of the New Zealand business rather than the wider priorities of an overseas group.

For Untamed Earth, that local focus adds confidence that investment in distribution and supply relationships will be directed toward opportunities in New Zealand. We ask the Commission to consider those practical effects to the extent that they bear on investment, service quality, supply resilience and competition over time.

Overall assessment

Untamed Earth's direct experience is that Fresh Direct has enabled growth by an independent organic vegetable producer. The proposed acquisition should provide a wider route to market and create further opportunities to expand production. We have no concern about the combined business having its own growing operations. In the present industry environment, investment by T&G Fresh and MG Marketing has become important to retaining productive capacity as older growers leave the industry.

Subject to the Commission's assessment of competition in the relevant markets, Untamed Earth supports clearance. We expect the acquisition to improve distribution opportunities for our business, support continued investment in New Zealand growing and place T&G Fresh under ownership with strong incentives to serve the New Zealand produce industry and public.